

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

Nos. 2:15-CR-04268-JB

ANTHONY RAY BACA, et al.

*Defendant.*

**ANTHONY RAY BACA'S NOTICE OF EXPERT WITNESS TESTIMONY**

Defendant Anthony Ray Baca submits, under Fed. R. Crim. P. 16, notice of his intent to introduce expert testimony during the defense of his case. The testimony of the experts noticed by Defendant Baca will be relevant to the issues to be tried in this matter, and will assist the jury in understanding matters not readily discernible to a lay individual. With this understanding, Defendant Baca provides notice of the following experts:

**Handwriting Expert Mark L. Songer**

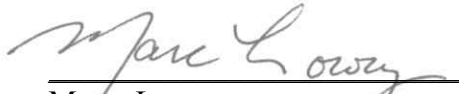
Mark L. Songer is an expert in handwriting analysis, formerly employed by the Federal Bureau of Investigation. It is anticipated that Mr. Songer will testify as necessary for rebuttal of the government's case, about the authorship of certain documents produced in discovery in this case. Mr. Songer will testify about the techniques used to identify the author of any particular handwriting sample, and the methodology to ensure an accurate and reliable assessment of the author of a particular handwriting sample. Using those techniques and methods, Mr. Songer will be able to testify whether an individual is the actual source of a handwriting sample.

**Forensic Computer Expert Gregory Kesden**

Gregory Kesden is an expert in computer forensic analysis. Mr. Kesden, once he has been allowed to inspect and analyze the cellular telephone and electronic surveillance devices used in this case, will be able to testify about the data and meta data recovered from those devices, and what that data and meta data reveals about when and how those devices were used, what types of communications and recordings were made with those devices, and, whenever possible, to whom such communications were made. In addition, Mr. Kesden will be able to inform the jury about the data that was destroyed by the individuals using the cellular phones and electronic surveillance at issue in this case.

Respectfully submitted,

ROTHSTEIN DONATELLI LLP



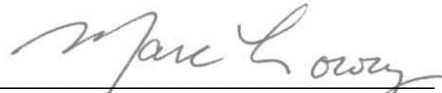
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*Attorneys for Anthony Ray Baca*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 15th day of September, 2017, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel for Plaintiff and Defendants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

A handwritten signature in cursive script, appearing to read "Marc Lowy", is written over a horizontal line.

ROTHSTEIN, DONATELLI, HUGHES  
DAHLSTROM, SCHOENBURG & BIENVENU, LLP